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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE
PAINTERS AND FLOORCOVERERS
JOINT COMMITTEE; *et al.*,

Plaintiffs,

vs.

SUPER STRUCTURES INC., a Nevada
corporation dba SUPER STRUCTURES;
SUPER STRUCTURES, INC., *et al.*,

Defendants.

CASE NO. 2:18-CV-01364-GMN-EJY

**JOINT MOTION TO EXTEND
DEADLINES TO FILE OPPOSITION
& REPLY TO MOTION TO
RECONSIDER, REPLY TO
OPPOSITION TO ATTORNEY'S
FEES MOTION AND JOINT PRE-
TRIAL ORDER**

(THIRD REQUEST)

COMES NOW, Defendants Super Structures, Inc. and Super Structures Inc. ("Super Structures") by and through their counsel of record, Marc P. Cook, Esq., of the law firm of Cook & Kelesis, Ltd., and Plaintiffs Board of Trustees of the Painters and Floor Coverers Joint Committee, et al. ("Plaintiffs"), by and through their counsel of record, Christensen James & Martin, Chtd. and pursuant to LR IA 6.1, hereby jointly move and request this Court to extend several deadlines as follows.

POINTS AND AUTHORITIES

On November 30, 2020, this Court entered its Order (ECF No. 62) granting Plaintiffs' Motion for Summary Judgment against Defendants Super Structures, denying Defendants' Motion for Summary Judgment, denying as moot Plaintiffs' Motion to Strike and denying as moot Defendants' Motion for Leave to File Excess Pages ("Summary Judgment Order"). The Summary

Judgment Order set deadlines for the filing of a Status Report and a Joint Pretrial Order. On December 14, 2020, Plaintiffs filed a Motion for Award of Attorney's Fees and Costs Against Judgment Debtors Super Structures, Inc. and Super Structures Inc. (ECF No. 63) ("Attorney's Fees Motion") based on this Court's Summary Judgment Order. Defendants have filed their Motion to Reconsider this Court's Summary Judgment Order (ECF No. 72) and their Opposition to Plaintiff's Motion for Award of Attorney's Fees and Costs (ECF No. 71) on January 26, 2021. The parties request that this Court extend the deadlines for thirty (30) days on the reply to opposition to the Attorney's Fees Motion, the opposition and reply to the Motion to Reconsider this Court's Order and for the filing of the Joint Pretrial Order. The Status Report has already been submitted by Plaintiffs on January 11, 2021 (ECF No. 68). Good cause exists to extend the time because Plaintiffs' and Defendants' attorneys are efforting to discuss possible resolutions. The requested extension will provide the parties with more opportunity to prepare and submit their pleadings. This is the third stipulation to extend the time by which the parties must file or answer the respective pleadings.

This will affect the schedule as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Opposition to Motion to Reconsider	February 8, 2021	March 8, 2021
Reply to Opposition to Motion to Reconsider	February 15, 2021	March 15, 2021
Reply to Opposition to Attorney's Fees Motion	February 1, 2021	March 1, 2021
Joint Pretrial Order	January 27, 2021	March 1, 2021

This request for an extension of time is not sought for any improper purpose or other purpose of delay.

The parties respectfully submit that the reasons set forth above constitute good cause for the

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1 extension and deadlines requested above.

2 **IT IS SO STIPULATED.**

3 DATED this 27th day of January, 2021.

4 COOK & KELESIS, LTD.

CHRISTENSEN JAMES & MARTIN

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6 By: /s/ Marc P. Cook
7 Marc P. Cook, Esq.
8 Nevada Bar No. 4574
9 517 S. Ninth Street
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Attorneys for Defendants

By: /s/ Wesley J. Smith
Wesley J. Smith, Esq.
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Attorneys for Plaintiffs

10 **IT IS SO ORDERED:**

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13 United States Magistrate Judge

14 Dated: January 27, 2021

15 Submitted by:

16 COOK & KELESIS, LTD.

17 By: /s/ Marc P. Cook
18 Marc P. Cook, Esq.
19 *Attorneys for Defendants*

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